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June 8, 2021

Mr. Jim Halvorson Administrator Montana Board of Oil and Gas Conservation 2535 St. Johns Avenue Billings, MT 59102

RE: Docket No. 52-2021 (Sections 12, 13 & 24-T26N-R58E); Docket No. 55-2021 (Sections 18, 19 & 30-T26N-R59E); and Docket No. 56-2021 (Sections 2 & 11-T26N-R59E)

Dear Mr. Halvorson:

I represent Continental Resources, Inc. (hereinafter "Continental") and draft this letter in protest of the captioned dockets filed by Bison Oil & Gas III, LLC (hereinafter "Bison"). Continental has several issues with the Bison applications. Those issues include, but are not limited to, the following:

For Docket No. 52-2021:

- a. Continental supports Grayson Mill Energy, LLC ("GME") as the operator of the underlying permanent spacing unit comprised of Sections 13 & 24, Township 26 North, Range 58 East. Furthermore, Continental would support GME as the operator of the proposed overlapping temporary spacing unit which would be comprised of Sections 12, 13 & 24, Township 26 North, Range 58 East.
- b. Bison is not the operator of the currently producing well in the underlying spacing unit. Bison has a significantly lower working interest than GME in the underlying spacing unit and the proposed overlapping temporary spacing unit. To our knowledge, Bison has not drilled a well in the State of Montana. For all of these reasons, Continental supports GME's request for the Board to enter an Order denying Bison's permits after the hearing.

For Docket No. 55-2021:

a. Continental supports GME as the operator of the underlying permanent spacing unit comprised of Sections 19 & 30, Township 26 North, Range 59 East. Furthermore, Continental would support GME as the operator of the proposed overlapping temporary spacing unit which would be comprised of Sections 18, 19 & 30, Township 26 North, Range 59 East.

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b. Bison is not the operator of the currently producing well in the underlying spacing unit. Bison has a significantly lower working interest than GME in the underlying spacing unit and the proposed overlapping temporary spacing unit. To our knowledge, Bison has not drilled a well in the State of Montana. For all of these reasons, Continental supports GME's request for the Board to enter an Order denying Bison's permits after the hearing.

For Docket No. 56-2021:

- a. Continental is familiar with Slawson Exploration Company ("Slawson") and its capabilities and experience operating wells in Roosevelt County, Montana.
- b. Continental supports Slawson as the operator of the underlying permanent spacing unit comprised of Sections 2 & 11, Township 26 North, Range 59 East.
- c. Continental supports Slawson's request for the Board to enter an Order denying Bison's permits after the hearing.

Sincerely,

LATHROP GPM LLP

By:

Patrick B. McRorie

cc: Scott Davis, Continental Resources, Inc.
Matt Simmons, Continental Resources, Inc.